

**MODEL REGIONAL MEMORANDUM OF UNDERSTANDING**  
**Promoting Coordination Between Source Water and Tank Programs**

**Proposed Cross-Program Action Plan:**  
**to be incorporated in**

**MOU between UST/LUST and Source Water/Wellhead Protection Programs in EPA Region -- (or State x)**

**Purpose Statement**

EPA's Offices of Underground Storage Tanks (OUST) and Ground Water and Drinking Water (OGWDW) recognize that USTs are identified as potential sources of contamination of source waters in many Regions including Region --. In order to reduce the risk of USTs to drinking water sources, in its July 2004 memo, OUST and OGWDW encouraged the EPA Regions to take part in the cross-program coordination between the UST and Source Water Protection programs.

This agreement provides for coordination of efforts between these two program offices to prevent the contamination and facilitate the remediation of sources of drinking water supplies. The UST and Source Water Programs [insert division names] have a joint responsibility to minimize the likelihood of contamination of both surface and groundwater public water supplies. Leaks and spills of petroleum hydrocarbons represent a significant risk to public water supply quality, and a significant expense to the [insert funding source(s)]. The Source Water Program has mapped the location and source protection areas of PWS's in [state(s)], with the cooperation and assistance of the UST program and USEPA. To assist in accomplishing this joint responsibility, it is in both agencies' interest to share information and resources about spills and leaks in source protection areas.

In response to the July 2005 memo, Region --'s UST and source water protection programs have prepared this proposed action plan [to be incorporated in the existing MOU between Region --'s [insert UST and source water program office names]]. The action plan is intended to be a strategic approach to use program resources most efficiently and effectively. The plan is designed to address three main goals: (1) gathering and sharing information; (2) creating new opportunities for education and outreach; (3) targeting specific actions in designated source water areas.

**Background**

Scope of Problem:

1. States reporting USTs as top source of potential groundwater contamination under CWA section 305(b)

Program Roles and Responsibilities

Overview of Actions to Date

[Insert brief overview of prior datasharing and other program coordination efforts, including GIS tools, site ranking software (e.g., Region 3: [www.epa.gov/reg3wcmd/undergroundMTBE.htm](http://www.epa.gov/reg3wcmd/undergroundMTBE.htm)), targeting compliance inspections and enforcement, providing technical assistance to businesses, notification of spills and new tank installation, prioritizing cleanups in source water areas, others].

**Action Plan**

**1. Gather and Share Information: locational data on USTs/LUSTs and public drinking water wells**

Progress to Date:

- [Insert highlights of Regional and individual state actions to date, e.g. digitized locational data on gas stations and tanks; source water area polygons]

Proposed Actions in FY05 [sample]: (include responsible agency/program)

- Cross-training for tank inspectors, source water program staff, and UIC staff on importance of source water protection areas, availability of data, and UST program data.
- WCMD share the UST/LUST locational data of Delaware with WPD
- WPD review of locational data of public drinking water wells
- WPD share the evaluated locational data of public drinking water wells of Delaware with WCMD
- WCMD will create and share with WPD a GIS layer which contains all the USTs, LUST, and public wells in one map
- WCMD and WPD will do the same for the entire state of Pennsylvania, Virginia and partial coverage of Maryland
- Work with additional states to develop and/or obtain UST locational database
- Develop or adapt existing software tool to identify for additional states, the USTs and/or LUSTs and, count the number of USTs and/or LUSTs within a given radius (say, ½ mile, 1 mile or two miles) of a public drinking water well, and the number of public drinking water wells within a given radius (say, ½ mile, 1 mile or 2 miles) of an UST or a LUST..

## **2. Create new opportunities for education and outreach (samples):**

Progress to Date:

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Proposed Activities in FY 05 (include responsible agency/program)

- Joint meetings between state UST and source water protection program staff, to educate UST programs about SWA data and source protection opportunities, and provide information on UST program to SWP staff..
- Educate tank owners/operators
- Document success stories through case studies

## **3. Target specific actions in designated source water areas (samples):**

Progress to Date:

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Proposed Activities in FY 06: (include responsible agency/program)

- Target significant percentage of tank inspections in source water areas.
- Assist Underground Injection Control (UIC) program through UST inspectors looking for motor vehicle waste disposal wells (e.g. floor drains) during inspection and querying re where they drain to, and sharing information with UIC program.
- UIC inspectors similarly share information on tanks with UST staff. (Motor vehicle Waste Disposal Wells Rule targets source water protection areas, and such wells are often co-located with USTs).
- Target compliance and cleanup efforts to high priority source water areas.
- Target transient non-community water systems with food service for UST inspections.
- Establish notification system and contacts for spills and new tank installation.
- Facilitate communication, data sharing, and priority setting in cross-state source water areas.